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International Affairs
National Telecommunications and
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U.S. Department of Commerce
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Washington, DC 20230

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The Internet Assigned Numbers Authority (IANA) Functions

Further Notice of Inquiry

SportAccord welcomes the opportunity to submit this comment in connection with NTIA's Further Notice of Inquiry regarding the IANA Functions.

SportAccord is the umbrella organization for both Olympic and non-Olympic sports and has a privileged and permanent relationship with the IOC (International Olympic Committee), ASOIF (Association of Summer Olympic Federations) and AIOWF (Association of International Olympic Winter Federations). SportAccord is also the organizer of various sporting events such as World Combat Games and World Mind Games. Its mission is to unite, support and promote its Member international sports federations and organizations for the co-ordination and protection of their common aims and interests, communication and co-operation, while at the same time conserving and respecting their autonomy. Therefore, the secure stable operation of the Internet is critical to this mission.



The exhaustive list of the 105 SportAccord members can be found on our corporate website at <http://www.sportaccord.com/>. SportAccord has a direct interest in protecting the interests of International and National Sports Federations, Sport's event stakeholders and organizers, athletes and sponsors in connection with the expanse of the new gTLD space.

Therefore, SportAccord is supportive of proposed Paragraph C.2.2.1.3.2 which will require the future Contractor of the IANA functions to include documentation demonstrating "how the proposed string has received consensus support from relevant stakeholders and is supported by the global public interest." SportAccord believes this core requirement is consistent with ICANN or any future Contractor's obligation to act as a trustee of a global resource, and in line with the concerns raised by a number of national governments in ICANN's Government Advisory Committee.

This provision is also consistent with the obligations set forth in the Affirmation of Commitment between the NTIA and the current IANA contractor, ICANN. Specifically Paragraph 4 which states that "ICANN and DOC recognize that there is a group of participants that engage in ICANN's processes to a greater extent than Internet users generally." While commercial interests, namely existing and prospective registries and registrars, have been vocally advocating for the unlimited expanse of the domain name space, the NTIA should take into account the need for ICANN or any future IANA functions Contractor to address all stakeholders concerns. This point deserves heightened attention based upon the recent European Commission communication regarding vertical integration, in which the issue of registrars and registries service on the ICANN Board and ICANN's reliance on their funds "may cast doubts on the impartiality of its decision-making."

SportAccord supports the NTIA's commitment to openness and transparency and the multi-stakeholder model. Respecting with this commitment, SportAccord wishes to disclose as part of its submission that it is evaluating pursuing one or more gTLDs for the primary purpose of protecting the global sports community given the lack of sufficient safeguards in ICANN's final Applicant Guidebook. Having the inclusion of a Paragraph C.2.2.1.3.2 in a final IANA SOW would be an important factor is empowering SportAccord and its members to make an informed business decision going forward as opposed to a merely defensive action.

Sincerely,

Vincent Gaillard,
Director General